



217/782-6760

JCC

June 1, 1991

Refer to: L119040007-Madison County
Taracorp/NL Industries
Superfund/Technical

Brad Bradley
Remedial Project Manager
U.S. EPA/Region V
230 S. Dearborn
Chicago, IL 60604

Dear Mr. Bradley:

We have finished the review of the Draft Scope of Services for the NL Industries/Taracorp Pre-Design Work (dated May 3, 1991 and received May 6, 1991; May 8, 1991; and May 28, 1991). We offer the following comments:

1. Item 9. Submittals: Please be aware that IEPA will require 5 copies of the draft report and final report to help expedite the review process at the Agency. Please adjust the requested copies (20) to be submitted to reflect this requirement. OK
2. 10.2. Chemistry Input for Scope of Services. Item 2.4.1: IEPA QA/QC personnel should be included as one of the signatures in approving the QAPJP. OK
3. 10.3. Site Specific Chemistry. Item 2: Soil Investigations at the SLLR facility has been conducted. Trenches at least 4 ft. deep were dug at locations on-site. At these depths, natural soils had not been reached (i.e., fill material, slag, battery chips, etc. were still being encountered). Therefore, IEPA questions the number and locations for the samples to be taken at Area 1. The 5 ft. depth may not be adequate to determine the vertical extent of contamination to 1000 ppm. OK - chg. boring intervals
4. 10.4. Scope of Services for Pre-Design Work. Item 3(a). Boring Logging Requirements: What is the USGS classification to describe unconsolidated material? It is referred to on pages 2 and 6. USGS
5. 10.4. Scope of Services for Pre-Design Work. Item 3(c). Ground Water Monitoring Wells: Monitoring wells should be registered with the IEPA. OK

ok ?
The use of vegetable oil for monitoring well installation is discouraged by our Agency if VOAs are to be analyzed for. Stainless steel should be the material in the saturated zone instead of PVC (page 8, items 3b and 3c), since the groundwater is to be sampled for volatiles. Finally prior to the abandonment of a monitoring well, IEPA should be notified. ok

6. 11.1. Scope of Work for the Remedial Design and Remedial Action. Item II:

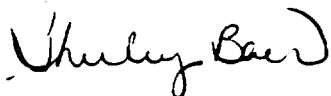
In accordance to design requirements for landfills [35 IAC 724.401(a)(c)] the clay liner may not be sufficient for the lateral expansion. For a RCRA facility the installation of at least two liners and a leachate system ~ no would be required. Please check with your RCRA unit to determine whether these requirements apply to the NL Industries/Taracorp site.

I apologize for not meeting the May 28, 1991 deadline. We hope you are able to incorporate these comments into your final scope of services proposal.

If you have any questions, please feel free to call me at 217/782-1803.

Thank you for allowing us to review the draft document.

Sincerely,



Shirley Baer, Project Manager
Federal Sites Unit
Remedial Project Management Section
Division of Land Pollution Control

cc: Division File

Charlie Zeal/Eric Minder
Jim O'Brien/Connie Sullinger